

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

June 2 1993
BRUCE RIFKIN, Clerk
By Shirley Boyd Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMMED ALI VASSEGHI,
a/k/a NADER VASSEGHI,

Defendant.

NO.

CR93-286R

INDICTMENT



93-CR-00286-INDI

The Grand Jury charges that:

COUNT I

Between on or about November 27, 1992, and November 30, 1992,
at Bellevue, within the Western District of Washington, MOHAMMED ALI
VASSEGHI, a/k/a NADER VASSEGHI (hereinafter "MOHAMMED ALI
VASSEGHI"), being an employee of the Bellevue Financial Center
Branch of Pacific Northwest Bank, a bank the deposits of which were
then insured by the Federal Deposit Insurance Corporation, with
intent to injure and defraud this bank, did embezzle, abstract, and
purloin approximately Nine Thousand Dollars (\$9,000.00) of the
moneys, funds, and credits of this bank, in that MOHAMMED ALI
VASSEGHI, prepared a teller's trade in conjunction with the transfer

1 of Nine Thousand Dollars (\$9,000.00) from the vault to his teller's
2 cash drawer; took Nine Thousand Dollars (\$9,000.00) from the vault;
3 destroyed the tellers trade; and retained this money for his own use
4 and benefit.

5 All in violation of Title 18, United States Code, Section 656.
6

7 COUNT II

8 A. INTRODUCTION

9 1. At all relevant times, the deposits of Bank of America,
10 N.A., Bank One, First Interstate Bank of California, First
11 Interstate Bank of Washington, and Pacific Northwest Bank were
12 insured by the Federal Deposit Insurance Corporation.

13 2. At all relevant times, MOHAMMED ALI VASSEGHI maintained a
14 checking account at First Interstate Bank of Washington.

15 3. At all relevant times, MOHAMMED ALI VASSEGHI maintained
16 two credit card accounts at Bank of America, N.A., account number
17 5432 2570 0301 4209 and account number 5254 0022 3184 0628.

18 4. At all relevant times, MOHAMMED ALI VASSEGHI maintained a
19 credit card account at First Interstate Bank of California, account
20 number 4050 149 052 616.

21 5. At all relevant times, MOHAMMED ALI VASSEGHI maintained a
22 credit card account at Bank One, account number 5411 3011 8482 0169.
23

24 B. SCHEME AND ARTIFICE TO DEFRAUD

25 6. It was a part of the scheme and artifice to defraud these
26 banks ("the scheme and artifice to defraud") that MOHAMMED ALI
27 VASSEGHI obtained cash advances totaling Four Thousand Five Hundred
28

1 Dollars (\$4,500.00) at the Bellevue Financial Center of Pacific
2 National Bank using four different credit card accounts; Bank of
3 America, N.A. account numbers 5432 2570 0301 4209 (\$300.00) and 5254
4 0022 3184 0628 (\$300.00), Bank One account number 5411 3011 8482
5 0169 (\$1,900.00), and First Interstate Bank of California account
6 number 4050 149 052 616 (\$2,000.00).

7 7. It was a further part of the scheme and artifice to
8 defraud that MOHAMMED ALI VASSEGHI deposited the proceeds of these
9 cash advances together with other deposits to his checking account
10 at First Interstate Bank of Washington, thereby increasing the
11 balance in his checking account by \$6,365.00.

12 8. It was a further part of the scheme and artifice to defraud
13 that MOHAMMED ALI VASSEGHI purchased a Pacific Northwest Bank
14 cashier's check for Six Thousand Seven Hundred Dollars (\$6,700.00).

15 9. It was a further part of the scheme and artifice to defraud
16 that MOHAMMED ALI VASSEGHI paid for this cashier's check with a
17 personal check drawn on his First Interstate Bank of Washington
18 account.

19 10. It was a further part of the scheme and artifice to
20 defraud that on the day that MOHAMMED ALI VASSEGHI purchased the
21 cashier's check, he cashed it at a branch of First Interstate Bank
22 of Washington.

23 11. It was a further part of the scheme and artifice to
24 defraud that on the day that MOHAMMED ALI VASSEGHI purchased the
25 cashier's check, he prepared and negotiated another personal check
26 against his First Interstate Bank of Washington account for
27 approximately Six Thousand Eight Hundred Fifty Dollars (\$6,850.00),
28

1 thereby leaving insufficient funds in the account to pay the
2 personal check for Six Thousand Seven Hundred Dollars (\$6,700.00)
3 that he had written for the purchase of the cashier's check.

4 C. EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

5 12. On or about November 27, 1992, at Bellevue, within the
6 Western District of Washington, MOHAMMED ALI VASSEGHI, for the
7 purpose of executing the scheme and artifice to defraud Pacific
8 Northwest Bank, prepared a personal check against his First
9 Interstate Bank of Washington account for approximately Six Thousand
10 Eight Hundred Fifty Dollars (\$6,850.00), thereby leaving
11 insufficient funds in his account to pay for a personal check for
12 Six Thousand Seven Hundred Dollars (\$6,700.00) that he had earlier
13 written to Pacific Northwest Bank.

14 All in violation of Title 18, United States Code, Section 1344.

15
16 COUNTS III - VI

17 A. INTRODUCTION AND SCHEME AND ARTIFICE TO DEFRAUD

18 1. The Grand Jury incorporates by reference the allegations
19 contained in paragraphs 1 through 11 of Count II of this Indictment.

20 B. EXECUTION OF THE SCHEME AND ARTIFICE TO DEFRAUD

21 2. On or about November 17, 1992, at Bellevue, within the
22 Western District of Washington, MOHAMMED A. VASSEGHI, for the
23 purpose of executing the scheme and artifice to defraud Bank of
24 America, N.A., Bank One, and First Interstate Bank of California,
25 requested, signed for, and obtained, without intent to pay, cash
26 advances against credit card accounts as more fully described below;
27 each such advance constituting a separate count of this Indictment.

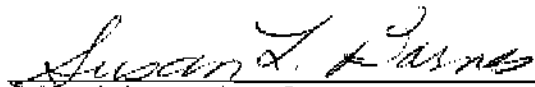
COUNT	FINANCIAL INSTITUTION	ACCOUNT NUMBER	AMOUNT
III	Bank of America, N.A.	5432 2570 0301 4209	\$ 300.00
IV	Bank of America, N.A.	5254 0022 3184 0628	\$ 300.00
V	Bank One	5411 3011 8482 0169	\$1,900.00
VI	First Interstate Bank of California	4050 149 052 616	\$2,000.00

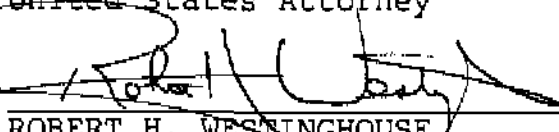
All in violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

DATED: June 3, 1993


FOREPERSON


SUSAN L. BARNES
United States Attorney


ROBERT H. WESSINGHOUSE
Assistant United States Attorney